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** OF COUNSEL

May 25, 2021

VIA ECF

Honorable John P. Cronan
U.S. District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Diane Murphy, et al. v. NCL (Bahamas) Ltd., et al.*
Case No. 1:21-cv-02211

Dear Judge Cronan:

We write on behalf of Plaintiffs Diane and Megan Murphy in the above-referenced action (the “Action”) to request an adjournment of the Initial Pretrial Conference (“IPTC”) and an extension of the attendant deadline for submitting a joint letter, proposed case management plan, and scheduling order.

The Court’s March 16, 2021, Notice of Assignment scheduled the IPTC for June 7, 2021, at 11:00 a.m. and ordered the parties to submit a joint letter, proposed case management plan, and scheduling order no later than seven (7) days prior thereto (ECF No. 7), which we understand would be due on Friday, May 28 in light of Memorial Day. Plaintiffs respectfully request that the Court adjourn the IPTC by 45 days to Thursday, July 22, 2021, or a date

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thereafter, with a deadline to submit the attendant filings seven (7) days prior to the IPTC adjourned date.

Plaintiffs respectfully request the extension for two reasons. First, Defendants have not yet appeared in the Action and, therefore, a joint submission would be premature. Second, while Defendants have not yet appeared, the parties have been engaged in good-faith negotiations to resolve the Plaintiffs' claims and believe it is in the interest of judicial economy and consistent with Federal Rule of Civil Procedure 1 to afford the parties an additional 45 days to continue those negotiations.

This is the first requested extension. We informed counsel for Defendants of Plaintiffs' intent to request an extension on Monday, May 24, and did not hear back from counsel before the filing of this request.

Thank you for Your Honor's attention and consideration of this matter.

Respectfully submitted,

s/ David S. Preminger

David S. Preminger

DSP:lkn

cc: Brett M. Berman, Esq., Senior Director, Passenger & Crew Claims, Norwegian Cruise Line Holdings Ltd., via email at: bberman@ncl.com

This request is granted. The conference scheduled for June 7, 2021 at 11:00 a.m. is adjourned to July 26, 2021 at 11:00 a.m. The parties shall submit the joint letter and proposed case management plan and scheduling order by July 19, 2021.

SO ORDERED.

Date: May 25, 2021
New York, New York


JOHN P. CRONAN
United States District Judge